



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

JUN 23 1994

Mr. Douglas L. Overdorff, Project Officer  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
Northcentral Regional Office  
200 Pine Street  
Williamsport, PA 17701-6510

Re: State ARARs for Centre County Kepone Site, State College,  
Centre County, Pennsylvania

Dear Mr. Overdorff:

The purpose of this letter is to request the State ARARs regarding the Centre County Kepone Site ("Site").

As you know, the comments on the draft Feasibility Study were forwarded to Ruetgers-Nease on April 26, 1994. As we approach the completion of the feasibility study, I would like to request that PADER identify the potential chemical-, location-, and action-specific, state applicable or relevant and appropriate requirements ("ARARs") for this site, in accordance with sections 300.400(g), 300.430(e)(9), 300.515(d), and 300.515(h)(2) of the National Contingency Plan ("NCP"), 40 C.F.R. §§ 300.400(g), 300.430(e)(9), 300.515(d), and 300.515(h)(2). In addition, please identify any advisories, criteria or guidance which would be appropriate for inclusion in the "to be considered" ("TBC") category. Please submit this information, in writing, within thirty working days.

In order to adequately consider the appropriateness of these requirements, specific citations to statutory and regulatory sections are needed. The preamble to the NCP states as follows at 55 Fed. Reg. 8746:

[T]he language of CERCLA section 121(d)(2)(A) makes clear, and program expediency necessitates, that the specific requirements that are applicable or relevant and appropriate to a particular site be identified. It is not sufficient to provide a general "laundry" list of statutes and regulations that might be ARARs for a particular site. The state, and EPA if it is the support agency, must instead provide a list of requirements with specific citations to the section of law identified as a potential ARAR, and a brief explanation of why that requirement is considered to be applicable or relevant and appropriate to the site.

AR307862

If you have any questions concerning this request please, do not hesitate to contact me at (215) 597-8186. Thank You for your assistance in this matter.

Sincerely,



Frank Klanchar  
Remedial Project Manager  
Central Pennsylvania Remedial Section

cc: Pam Lazos (3RC22)  
Tony Dappolone (3HW24)

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